

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE ALTA MESA RESOURCES, INC.
SECURITIES LITIGATION

No. 4:19-cv-00957

ALYESKA MASTER FUND, L.P.,
ALYESKA MASTER FUND 2, L.P., and
ALYESKA MASTER FUND 3, L.P.,

Judge George C. Hanks, Jr.

Plaintiffs,

No. 4:22-cv-01189

v.

ALTA MESA RESOURCES, INC., *et al.*

Defendants.

ORBIS GLOBAL EQUITY LE FUND
(AUSTRALIA REGISTERED), ORBIS
GLOBAL EQUITY FUND (AUSTRALIA
REGISTERED), ORBIS GLOBAL
BALANCED FUND (AUSTRALIA
REGISTERED), ORBIS SICAV, ORBIS
INSTITUTIONAL GLOBAL EQUITY
L.P., ORBIS GLOBAL EQUITY FUND
LIMITED, ORBIS INSTITUTIONAL
FUNDS LIMITED, ALLAN GRAY
AUSTRALIA BALANCED FUND,
ORBIS OEIC, and ORBIS
INSTITUTIONAL U.S. EQUITY L.P.,

No. 4:22-cv-2590

Plaintiffs,

v.

ALTA MESA RESOURCES, INC., *et al.*,

Defendants.

**AGREED MOTION TO EXTEND DEADLINE
FOR BAYOU CITY ENERGY AND WILLIAM MCMULLEN TO FILE RESPONSE TO
MOTION TO UNSEAL**

Defendants Bayou City Energy and William McMullen respectfully submit this agreed motion to extend the date for Bayou City Energy and Mr. McMullen to file a response to *Class Plaintiffs' Motion to Unseal Defendant McMullen's Motion for Summary Judgment and Accompanying Exhibit* [Dkt. 442]. The current response deadline is October 20, 2023, previously extended from October 11, 2023.

Good cause exists for an extension. The parties have conferred (and continue to do so) regarding the motion to unseal in an effort to narrow the dispute between them. As part of those efforts, Bayou City Energy and Mr. McMullen are continuing to analyze what portions of the two remaining sealed exhibits (Exs. A and D) may be unsealed and what portions they contend must remain under seal, and why. In each case, Bayou City and Mr. McMullen have also agreed to file redacted exhibits in an effort to reduce the amount of sealed information on the docket.

Additionally, significant work is ongoing in the case related to expert discovery. Discussions are taking place to schedule approximately fifteen depositions between now and the close of expert discovery on November 17, 2023. Since that is right before Thanksgiving, the parties selected December 1, 2023 as the date to file the response, as opposed to earlier, which would put the reply date over Thanksgiving.

No party will suffer any prejudice from a response being submitted by December 1, 2023 instead of October 20, 2023.

Counsel for Class Plaintiffs is agreed to granting Bayou City Energy and Mr. McMullen until December 1, 2023 to respond to the motion to unseal.

DATED: October 19, 2023

/s/ Nick Brown

Nick Brown

Texas Bar No. 24092182 S.D. Tex. ID 2725667

Kenneth A. Young (*Attorney-in-Charge*)

Texas Bar No. 25088699 S.D. Tex. ID 2506614

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

609 Main Street

Houston, Texas 77002

Phone: (713) 836-3600

Fax: (713) 836-3601

Emails: nick.brown@kirkland.com

kenneth.young@kirkland.com

*Counsel for Bayou City Energy Management, LLC
and William McMullen*

CERTIFICATE OF SERVICE

I certify that the foregoing document was served on all counsel of record via the Court's electronic filing system on October 19, 2023.

/s/ Nick Brown

Nick Brown

CERTIFICATE OF CONFERENCE

To the best of my knowledge, no party expressed opposition to this motion.

/s/ Nick Brown

Nick Brown